

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

CHICKEN SOUP FOR THE SOUL
ENTERTAINMENT, INC., *et al.*,

Debtors.¹

Chapter 7

Case No. 24-11442 (MFW)

(Jointly Administered)

GEORGE L. MILLER, CHAPTER 7 TRUSTEE

Plaintiff.

v.

WILLIAM J. ROUHANA, JR., AMY L.
NEWMARK, CHRISTOPHER MITCHELL,
FRED M. COHEN, COSMO DENICOLA,
MARTIN POMPADUR, CHRISTINA WEISS
LURIE, DIANA WILKIN, VIKRAM
SOMAYA, JASON MEIER, AMANDA R.
EDWARDS, CHICKEN SOUP FOR THE
SOUL PRODUCTIONS, LLC, CHICKEN
SOUP FOR THE SOUL, LLC, CHICKEN
SOUP FOR THE SOUL HOLDINGS, LLC,

Adversary No. 25-50399 (MFW)

Re: Adv. D.I. 1

Defendants.

**STIPULATION BY AND AMONG CHAPTER 7 TRUSTEE AND DEFENDANTS FRED
M. COHEN, MARTIN POMPADUR, CHRISTINA WEISS LURIE, DIANA WILKIN,
COSMO DENICOLA, AND VIKRAM SOMAYA EXTENDING THE TIME TO
RESPOND TO COMPLAINT AND ESTABLISHING A BRIEFING SCHEDULE**

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor's federal tax identification number (where applicable), are: 757 Film Acquisition LLC (4300); Chicken Soup for the Soul Entertainment Inc. (0811); Chicken Soup for the Soul Studios, LLC (9993); Chicken Soup for the Soul Television Group, LLC; Crackle Plus, LLC (9379); CSS AVOD Inc. (4038); CSSESIG, LLC (7150); Digital Media Enterprise, LLC; Halcyon Studios, LLC (3312); Halcyon Television, LLC (9873); Landmark Studio Group LLC (3671); Locomotive Global, Inc. (2094); Pivotshare, Inc. (2165); RB Second Merger Sub LLC (0754); Redbox Automated Retail, LLC (0436); Redbox Entertainment, LLC (7085); Redbox Holdings, LLC (7338); Redbox Incentives LLC (1123); Redwood Intermediate, LLC (2733); Screen Media Films, LLC; Screen Media Ventures, LLC (2466); and TOFG LLC (0508).

Plaintiff George L. Miller, the chapter 7 trustee for the above-captioned debtors (the “Chapter 7 Trustee”), and defendants Fred M. Cohen, Martin Pompadur, Christina Weise Lurie, Diana Wilkin, Cosmo DeNicola, and Vikram Somaya (collectively, the “Defendants”, and with the Chapter 7 Trustee, the “Parties”), by and through the undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on March 12, 2025, the Chapter 7 Trustee initiated the above-referenced adversary proceeding against the Defendants by filing the *Complaint for (I) Breach of Fiduciary Duty; (II) Aiding and Abetting Breach of Fiduciary Duty; (III) Avoidance of Fraudulent Transfers; (IV) Recovery of Illegal Dividends; (V) Damages for Non-Payment of Employee Wages, Benefits and Payroll Taxes; (VI) Equitable Subordination; and (VII) Disallowance of Claims* [A.D.I. 1] (the “Complaint”);

WHEREAS, on March 12, 2025, this Court issued the summons [A.D.I. 3] with respect to the Complaint;

WHEREAS, the current deadline to answer, move or otherwise respond to the Complaint is April 11, 2025;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY THE PARTIES THAT:

1. The Defendants’ deadline to answer, move or otherwise respond to the Complaint is hereby extended through and including May 9, 2025.

2. Notwithstanding Local Rule 7007-1(a), the Chapter 7 Trustee may file its answering brief in response to Defendants’ motion(s) to dismiss the Complaint, if any, within twenty-eight (28) days of service thereof. The Defendants shall have fourteen (14) days from

service of the Chapter 7 Trustee's answering brief to file and serve a reply brief in support of the motion(s) to dismiss the Complaint, if any.

3. This Stipulation is without prejudice to the rights of the parties to seek an extension or modification of the deadlines set forth herein through stipulation or order of the Court.

Dated: April 8, 2025

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/s/ Steven W. Golden

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